

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

HARRY E. WILLIAMS, JR.,

Plaintiff,

v.

PENNSYLVANIA TURNPIKE  
COMMISSION,

Defendant.

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CIVIL ACTION  
  
NO. 1:CV 01-0877  
  
(Judge Rambo)

**DEFENDANT'S LIST OF TRIAL EXHIBITS**

DEFENDANT	PLAINTIFF	DESCRIPTION OF OBJECT OR ITEM	IDENTIFIED	EVIDENCE	RULING	WITNESS ON STAND
1	1	Pennsylvania Turnpike Commission Policy and Procedure for Promoting Employees, Policy No. 65 (PTC 0534-36)	4-15-03	4-15-03	Admit	Joanne Gitto Davis
2	10	April 23, 1999 Vacancy Notice (PTC 0328)	4-15-03	4-15-03	Admit	Joanne Gitto Davis
3		Job posting for position of Communications Center Duty Officer (response requested by May 7, 1999) (PTC 0269)				

Exhibit A

DEFENDANT	PLAINTIFF	DESCRIPTION OF OBJECT OR ITEM	IDENTIFIED	EVIDENCE	RULING	WITNESS ON STAND
4	11	April 23, 1999 Letter from H. Williams to J. Gitto Davis; H. Williams' application for Communication Center Duty Officer (April 1999 posting) (w attached resume, references, job descriptions (Radio Operator I and II and Communications Center Duty Officer)(HW0016-26)				
5	15	May 21, 1999 Memorandum from J. Gitto Davis to H. Williams (PTC 0335)	4-15-03	4-15-03	Admit	Joanne Gitto Davis
6	12	April 23, 1999 Promotion Application Log (PTC 0242-43)	4-15-03	4-15-03	Admit	Joanne Gitto Davis
7	3	Job Description for Duty Officer (PTC 0325-27)	4-15-03	4-15-03	Admit	William Capone
8		Job Description: Radio Operator II (PTC 0077)				
9		May 12, 1999 Memorandum from J. Gitto Davis to J. Martino (PTC 0272)	4-15-03	4-15-03	Admit	Joanne Gitto Davis
10	13	June 4, 1999 Recommended Personnel Actions (PTC 0244-46)	4-15-03	4-15-03	Admit	William Capone
11		Pennsylvania Human Relations Commission Retaliation Questionnaire (IN-14 Form) re: Williams' Charge/Docket No. E-94646-D(?)				

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12	40	February 3, 1999 Memorandum from H. Williams to K. Zawacki re: incident involving J. Curanzy and T. Edwards (HW 0001-3)				
13	41	February 22, 1999 Memorandum from H. Williams to K. Zawacki re: Follow-up to February 3 <sup>rd</sup> memo and incident involving J. Curanzy and T. Edwards (HW 0004-7)				
14	34	November 28, 2000 Job Bid Form re: Williams' bid for Customer Service Representative position (PTC 0070)				
15		October 30, 2000 Memorandum from J. Gitto Davis to G. Richards re: list of eligible bidders three Customer Assistance Center Representative positions (PTC 0004)				
16		December 1, 2000 Memorandum from J. Morack to D. Jordan, F. Shaffer, and T. Scanlon re: trial periods awarded for Customer Assistance Center Representatives positions, including H. Williams (PTC 0056)				

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17	39	January 10, 2001 Memorandum from J. Morack to P. Hernjak re: H. Williams' decision to stay in the Customer Assistance Center following trial period (PTC 0060)				
18	43	4/10/99 Memorandum from G. Rausch to H. Williams re: Inappropriate language and need to comply with Policy #61 (PTC 0941)	4-15-03	4-15-03	Admit	Greg Rausch
19	42	4/8/99 Memorandum from A. Rudy to H. Williams re: verbal warning for sleeping while on duty (TC 0945)				
20		April 2, 1996 Memorandum from H. Williams to J. DiRienzo re: Radio Operator 2 open position (PTC 1088)				
21		April 2, 1996 Memorandum from R. Frank to J. DiRienzo re: Williams only qualified bidder for Radio Operator 2 position (PTC 1089)				
22	2	Booklet: Interviewing the Job Applicant Training (PTC 1145-57)				

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23	31	E-mail from J. McCool to Gentlemen and Angie re: responsibilities of duty officers and J. McCool's response to an incident (HW 0072)				